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*Attorneys for Plaintiff*  
MARC COHODES

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

MARC COHODES, an individual,	)	Case No. 4:20-cv-02469-KAW
<i>Plaintiff,</i>	)	<b>PLAINTIFF MARC COHODES'S</b>
v.	)	<b>ADMINISTRATIVE MOTION TO</b>
UNITED STATES DEPARTMENT OF	)	<b>CONSIDER WHETHER CASES SHOULD</b>
JUSTICE, FEDERAL BUREAU OF	)	<b>BE RELATED</b>
INVESTIGATION, and EXECUTIVE	)	Judge: Hon. Kandis A. Westmore
OFFICE FOR UNITED STATES	)	
ATTORNEYS,	)	
<i>Defendants.</i>	)	
_____	)	

1 Pursuant to Civil Local Rules 3-12 and 7-11, Plaintiff Marc Cohodes submits this  
2 Administrative Motion to Consider Whether Cases Should Be Related. The related case was filed  
3 on June 17, 2020 and is captioned *Cohodes v. United States Dep't of Justice, et al.*, Case No. 3:20-  
4 cv-04015-DMR. Cohodes' June 17, 2020 lawsuit is related to this case.

5 "An action is related to another when: (1) The actions concern substantially the same  
6 parties, property, transaction or event; and (2) It appears likely that there will be an unduly  
7 burdensome duplication of labor and expense or conflicting results if the cases are conducted  
8 before different Judges." L.R. Civ. 3-12(a).

9 Cohodes filed this lawsuit on April 13, 2020. Shortly after filing this lawsuit, on April 28,  
10 2020, Cohodes filed new FOIA requests with the DOJ, the FBI, and the EOUSA. The new FOIA  
11 requests are virtually identical to the January 15, 2020 FOIA requests at issue in this case because  
12 they sought the same documents, from the same agencies. Cohodes submitted the new FOIA  
13 requests to clarify that he, rather than his attorneys, sought the requested documents, which may  
14 not have been clear in the January 15, 2020 FOIA requests.

15 Upon the FBI and EOUSA's failure to respond to Cohodes's April 28, 2020 FOIA requests  
16 in a timely fashion, on June 17, 2020, Cohodes filed a lawsuit to compel production of responsive  
17 information.

18 This lawsuit and Cohodes's June 17, 2020 lawsuit (Case No. 3:20-cv-04015-DMR)  
19 involve the same parties, the same FOIA requests, the same agencies, and the same underlying  
20 facts and events. Thus, both lawsuits meet the "same parties, property, transaction or event"  
21 standard in L.R. Civ. 3-12(a)(1).

22 Cohodes intends to dismiss his original lawsuit and proceed solely on his June 17, 2020  
23 Complaint.  
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Respectfully submitted,

THE NORTON LAW FIRM PC

Date: June 19, 2020

By: /s/ Matthew W. Turetzky  
David W. Shapiro (SBN 219265)  
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MARC COHODES